

REMARKS

The Office Action dated March 15, 2006, has been received and carefully considered. In this response, claims 4, 7, and 31 have been amended. Entry of the amendments to claims 4, 7, and 31 is respectfully requested. Reconsideration of the outstanding objections/rejections in the present application is also respectfully requested based on the following remarks.

I. THE OBJECTION TO CLAIMS 4, 7, AND 31

On page 2 of the Office Action, claims 4, 7, and 31 were objected to for informalities.

Claims 4, 7, and 31 have been amended to address the Examiner's concerns.

In view of the foregoing, it is respectfully requested that the aforementioned objection to claims 4, 7, and 31 be withdrawn.

II. THE INDEFINITENESS REJECTION OF CLAIMS 1-23

On page 2 of the Office Action, claims 1-23 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the invention. This rejection is hereby respectfully traversed.

The Examiner asserts that claim 1 is indefinite because claim 1 recites a method for natural gas distribution, but that

the body of claim 1 does not recite any step of distributing natural gas.

However, claim 1 recites a method for natural gas distribution compliance management, and claim 1 goes on to recite steps for managing compliance. Thus, there is no need for claim 1, or any claim depending from claim 1, to recite steps for distributing natural gas.

In view of the foregoing, it is respectfully requested that the aforementioned indefiniteness rejection of claims 1-23 be withdrawn.

III. THE ANTICIPATION REJECTION OF CLAIMS 1-6, 24-28, AND 38-41

On pages 3-7 of the Office Action, claims 1-6, 24-28, and 38-41 were rejected under 35 U.S.C. § 102(b) as being anticipated by Sturgeon et al. (U.S. Patent No. 5,726,884). This rejection is hereby respectfully traversed.

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a prima facie case of anticipation. In re Sun, 31 USPQ2d 1451, 1453 (Fed. Cir. 1993) (unpublished). Anticipation requires that a prior art reference disclose, either expressly or under the principles of inherency, each and every element of the claimed invention. Id. "In addition, the prior art reference must be enabling." Akzo N.V. v. U.S. International Trade Commission, 808 F.2d 1471, 1479, 1 USPQ2d

1241, 1245 (Fed. Cir. 1986), cert. denied, 482 U.S. 909 (1987). That is, the prior art reference must sufficiently describe the claimed invention so as to have placed the public in possession of it. In re Donohue, 766 F.2d 531, 533, 226 USPQ 619, 621 (Fed. Cir. 1985). Such possession is effected only if one of ordinary skill in the art could have combined the disclosure in the prior art reference with his/her own knowledge to make the claimed invention. Id.

Regarding claims 1, 24, 28, and 38, the Examiner asserts that Sturgeon et al. discloses the claimed inventions. Applicants respectfully disagree for several reasons. First, the Examiner asserts that Sturgeon et al. discloses scheduling a resource to respond to a compliance event, as claimed. However, Sturgeon et al. fails to disclose, or even suggest, such a feature. Specifically, Sturgeon et al. discloses system comprising a plurality of functional groupings and a database that allows the functional groupings to share or exchange information on hazardous substances for in-house and/or regulatory compliance functions (e.g., see column 9, lines 32-38). Such sharing or exchanging of information allows shared information to be available to a system user as soon as such information is input into the system (e.g., see column 9, lines 48-51). Thus, the benefit of this system is to allow easy and immediate access to current compliance data made up of

information shared among multiple compliance functions (e.g., see column 10, lines 8-19). Indeed, this system merely stores information and allows such information to be accessed in different forms.

In contrast, claims 1, 24, 28, and 38 recite scheduling an appropriate resource to respond to a particular compliance event (e.g., a natural gas line repair, service, inspection, follow-up, etc.). Nowhere does Sturgeon et al. disclose, or even suggest, such a feature. Indeed, Sturgeon et al. does not even use the term "schedule", or any variation thereof, except in the context of an emergency management grouping, which can be used to planning for and respond to "unscheduled" hazardous material releases (e.g., see column 16, lines 12-14). Accordingly, it is respectfully submitted that Sturgeon et al. fails to disclose, or even suggest, this claimed feature.

It is respectfully submitted that Sturgeon et al. also fails to disclose, or even suggest, a computer system including a main computer and a remote computer adapted to communicate with the main computer, at least a portion of a main program and the database accessible by the main computer, the remote computer accessing a remote program operative to display and modify only a remote portion of the plurality of compliance events and only a remote portion of the plurality of resources of the database, as claimed. The Examiner points to column 10,

lines 39-60, of Sturgeon et al. for a teaching of this claimed feature. However, nowhere in this particular section, or any section, of Sturgeon et al. is this claimed feature disclosed. In contrast, Sturgeon et al. merely discloses dynamic links between functional groupings, which is hardly a teaching of this claimed feature. Accordingly, it is respectfully submitted that Sturgeon et al. also fails to disclose, or even suggest, this claimed feature.

It is respectfully submitted that Sturgeon et al. further fails to disclose, or even suggest, periodically scanning a database to identify at least one of a plurality of compliance events requiring a response, and scanning the database to identify at least one of a plurality of resources to respond to the compliance event requiring the response, as claimed. The Examiner points to column 49, lines 35-61, of Sturgeon et al. for a teaching of this claimed feature. However, nowhere in this particular section, or any section, of Sturgeon et al. is this claimed feature disclosed. In contrast, Sturgeon et al. merely discloses identifying an appropriate person to respond to some future "unplanned" release of hazardous material. Such an "unplanned" event is much different than a current compliance event requiring a response. Accordingly, it is respectfully submitted that Sturgeon et al. also fails to disclose, or even suggest, this claimed feature.

In view of the foregoing, it is respectfully submitted that Sturgeon et al. does not disclose, or even suggest, the limitations of claims 1, 24, 28, and 38. Accordingly, it is respectfully submitted that claims 1, 24, 28, and 38 should be allowable over Sturgeon et al..

Regarding claims 2-6, 25-27, and 39-41, these claims are dependent upon independent claims 1, 24, and 38. Thus, since independent claims 1, 24, and 38 should be allowable as discussed above, claims 2-6, 25-27, and 39-41 should also be allowable at least by virtue of their dependency on independent claims 1, 24, and 38. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination.

In view of the foregoing, it is respectfully requested that the aforementioned anticipation rejection of claims 1-6, 24-28, and 38-41 be withdrawn.

IV: THE OBVIOUSNESS REJECTION OF CLAIMS 7-23 AND 29-37

On pages 7-9 of the Office Action, claims 7-23 and 29-37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sturgeon et al. (U.S. Patent No. 5,726,884) in view of Dialog (Santa Fe Pacific Corp.). This rejection is hereby respectfully traversed.

Regarding claims 7-23 and 29-37, these claims are dependent upon independent claims 1 and 28. Thus, since independent claims 1 and 28 should be allowable as discussed above, claims 7-23 and 29-37 should also be allowable at least by virtue of their dependency on independent claims 1 and 28. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination.

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claims 7-23 and 29-37 be withdrawn.

V. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,

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